

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MICHEL RIDGELY)	
Plaintiff)	
)	
v.)	Civil Action 05-1033 (GK)
)	
ELAINE CHAO,)	
Defendant)	

**PLAINTIFF'S REQUEST FOR LEAVE TO FILE SUPPLEMENTAL
OPPOSITION**

Comes now Plaintiff, through counsel, and requests leave to file an opposition to Defendant's reply brief. Defendant's reply brief raised additional issues and facts not contained in its motion to dismiss making a supplemental filing necessary.

Plaintiff's papers would be limited to the following:

1. Plaintiff's compliance with local rule 7(h) and which material fact the Defendant proffered was disputed.
2. Evidence in the record demonstrating Plaintiff's previous disclosures to the EEO office of witnesses mentioned in his declaration.

3. Legal precedent demonstrating that the Defendant's interpretation of the "administration charge requirement" (Defendant's reply p. 5) is incorrect.

4. Evidence in the record demonstrating that Plaintiff raised, in previous EEO filings, the matters set forth in his statement of issues #3 (retroactive promotion to 7/99).

Unless leave is granted, the Court would not have taken into consideration Plaintiff's position prior to ruling. There would be no prejudice to the government if it were permitted to respond.

In light of the foregoing, Plaintiff requests until Tuesday January 24, 2006 to file the supplemental papers.

MICHEL RIDGELY
By Counsel

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